

REMARKS

The application has been carefully reviewed in light of the final Office Action dated August 10, 2006. Claims 1 to 6, 8 to 21, 23 to 34 and 36 to 40 are pending in the application. Claims 1, 3, 16, 18, 31 to 34 and 36 have been amended, and Claims 1, 3, 16, 18, 31 to 34 and 36 are in independent form. Reconsideration and further examination are respectfully requested.

In the Office Action, Claim 31 was rejected under 35 U.S.C. § 102(b) over U.S. Patent No. 5,963,965 (Vogel); Claim 32 was rejected under 35 U.S.C. § 102(e) over U.S. Patent No. 7,024,658 (Cohen); Claims 1, 2, 4, 5, 8 to 14, 16, 17, 19, 20, 23 to 29, 33, 34 and 36 were rejected under 35 U.S.C. § 102(b) over Vogel; Claims 3 and 18 were rejected under 35 U.S.C. § 103(a) over U.S. Patent Application Publication No. 2003/0130837 (Batchilo) in view of U.S. Patent No. 6,533,822 (Kupiec); Claims 6 and 21 were rejected under 35 U.S.C. § 103(a) over Vogel in view of U.S. Patent No. 5,838,323 (Rose); and Claims 15, 30, 38 and 40 were rejected under 35 U.S.C. § 103(a) over Vogel in view of Kupiec. Reconsideration and withdrawal are respectfully requested.

Claims 1, 16, 33, 34 and 36

Independent Claim 1 as amended is directed to an apparatus for providing a user with an indication of the content of a text. The apparatus includes receiving means for receiving text data, topic determining means for determining from the text data at least one topic, and topic context data identifying means for identifying in the text data context data associated with the at least one topic determined by the topic determining means. The apparatus also includes topic context data position determining means for determining, for each item of context data identified by the topic context data identifying means, the actual

position and order of that item of context data within the text. In addition, the apparatus includes topic representation data providing means operable to provide topic representation data defining a graphical representation of the at least one topic in which are distributed visual indicia representing at least some of the context data with the distribution of the visual indicia indicating visually to the user the relative positions within the text data of the corresponding items of context data on the basis of the actual positions and order of the items of context data within the text as determined by the topic context data position determining means. The apparatus also includes supplying means for supplying the topic representation data for enabling display of the at least one topic representation to a user.

Independent Claims 16, 33, 34 and 36 are respectively directed to a method, computer-executable program instructions, a computer-readable storage medium and an apparatus which are seen to generally correspond with Claim 1.

Thus, among its many features, the invention of Claims 1, 16, 33, 34 and 36 provides for (i) determining, for each item of identified context data, the actual position and order of that item of context data within text, and (ii) providing topic representation data defining a graphical representation of at least one topic on the basis of the determined actual positions and order of the items of context data within the text. The applied reference of Vogel is not seen to disclose or suggest at least these features.

As understood by Applicants, Vogel is seen to disclose clustering pieces of textual data in accordance with their content, and producing maps that display the resulting clusters and the relationship between the clusters to a user. See Vogel, column 15, lines 35 to 60.

However, nothing in Vogel is seen to disclose or suggest that both a

position and an order of an item of context data are determined within text, muchless that topic representation data, which defines a graphical representation, is provided based on the determined actual position and order. Rather, Vogel is merely seen to disclose that maps of clustered phrases contain representations of word clusters and relationships therebetween.

Accordingly, Vogel is not seen to disclose or suggest (i) determining, for each item of identified context data, the actual position and order of that item of context data within text, and (ii) providing topic representation data defining a graphical representation of at least one topic on the basis of the determined actual positions and order of the items of context data within the text.

Allowance of Claims 1, 16, 33, 34 and 36 is therefore respectfully requested.

Claims 3 and 18

Independent Claim 3 as amended is directed to an apparatus for providing a user with an indication of the content of a text. The apparatus includes a part-of-speech associater for associating words in text data with part-of-speech identifiers to produce part-of-speech identified text data, a topic determiner for determining from the part-of-speech-identified text data at least one topic that occurs in the text data, and a topic context data identifier for identifying in the text data context data associated with the at least one topic determined by the topic determiner. The apparatus also includes a topic context data position determiner for determining, for each item of context data identified by the topic context data identifier, the actual order and position of that item of context data within the text. In addition, the apparatus includes a topic representation data provider operable to provide topic representation data defining a graphical representation of the at

least one topic in which are distributed visual indicia representing at least some of the context data with the distribution of the visual indicia indicating visually to the user the relative positions within the text data of the corresponding items of context data on the basis of the actual order and positions of the items of context data within the text as determined by the topic context data position determining means. The apparatus also includes a display controller for causing a display to display the topic representation.

Independent Claim 18 as amended is directed to a method which is seen to generally correspond with Claim 3.

Thus, among its many features, the invention of Claims 3 and 18 provides for (i) determining, for each item of identified context data, the actual order and position of that item of context data within text, and (ii) providing topic representation data defining a graphical representation of at least one topic on the basis of the determined actual order and positions of the items of context data within the text. The applied references of Batchilo and Kupiec are not seen to disclose or suggest at least these features.

The Office Action at page 8 acknowledges that Batchilo does not disclose determining an actual position of an item of context data within text, but cites to column 7, lines 1 to 9 and Figure 4 of Kupiec for this alleged disclosure.

The cited portions of Kupiec are seen to disclose that, within a system for generating a document summary, indicators are placed adjacent to corresponding extracted portions. These indicators have corresponding tabs positioned on the margin of a summary sheet. The tabs indicate the vertical position of the extracted portion in a summarized document that correspond to the indicators.

Although Kupiec may be seen to disclose that tabs indicate vertical

positions of extracted portions, Kupiec is not seen to disclose or suggest that in addition to position, an order of an item of context data within text is determined.

As such, even if Batchilo and Kupiec are combined in the manner proposed in the Office Action (assuming for argument's sake that such combination would be permissible), the result would not teach at least the features of (i) determining, for each item of identified context data, the actual order and position of that item of context data within text, and (ii) providing topic representation data defining a graphical representation of at least one topic on the basis of the determined actual order and positions of the items of context data within the text.

Allowance of Claims 3 and 18 is therefore respectfully requested.

#### Claim 31

Independent Claim 31 as amended is directed to a user interface. The user interface includes topic representation display means arranged to display in a display area a graphical representation of a topic identified in text data, in which graphical representation are distributed visual indicia representing visually to the user the relative positions within the text data of items of context data associated with the identified topic on the basis of the actual order and positions of the items of context data within the text. The user interface also includes user input receiving means for receiving user input from a user input device and for moving the cursor in the display area in accordance with the user input, and modifying means for modifying the graphical topic representation when the cursor is placed over a visual indicia.

A feature of the invention of Claim 31 therefore lies in displaying a graphical representation of a topic identified in text data on the basis of an actual order and

positions of items of context data within the text.

The applied reference of Vogel is not seen to disclose or suggest at least this feature, for reasons similar to those discussed above.

Allowance of Claim 31 is therefore respectfully requested.

Claim 32

Independent Claim 32 as amended is directed to a user interface. The user interface includes display means arranged to display a display region having first and second display areas adjacent to one another and configured to display in the first display area at least a portion of a text and to display in the second display area a graphical representation of a topic occurring in the text in which graphical representation are distributed visual indicia representing visually to the user context data associated with that topic such that the relative positions within the text data of items of context data associated with the topic are determined by the actual order and positions of the items of context data within the text, the display means also being arranged to display a cursor in the display region and a scroll bar associated with the first display area. The user interface also includes user input means for receiving user input from a user input device and for moving the cursor in the display region in accordance with the user input, and scrolling means for scrolling both the text in the first display area and the topic representation in the second display area when user input is received by the user input means that causes the cursor to move to input a scroll instruction.

A feature of the invention of Claim 32 therefore lies in displaying a graphical representation of a topic occurring in text, wherein relative positions within text data of items of context data associated with the topic are determined by the actual order

and positions of the items of context data within the text. The applied reference of Cohen is not seen to disclose or suggest at least this feature.

As understood by Applicants, Cohen discloses that a user can navigate a help guide using various different mechanisms. For example, the user can scroll through the help guide as if reading a book by using the scrolling controls 113 for a window 106. Alternatively, the user can select a particular bookmark, such as "Annotating PDF Documents" bookmark 108, which will cause a corresponding help page 110 to be presented to the user. The user also can jump to desired locations within the help guide by selecting (e.g., clicking on) links with a help page, such as link 112 in page 110. The link 112 points to another page (for example, "Using the annotation tools") within the help guide and, upon being clicked, causes that page to be displayed in the window 106. See Cohen, column 1, lines 42 to 56; and Figure 1.

However, nothing in Cohen is seen to disclose or suggest that a graphical representation of a topic occurring in text is displayed, wherein relative positions within text data of items of context data associated with the topic are determined by the actual order and positions of the items of context data within the text.

Accordingly, allowance of Claim 32 is respectfully requested.

Accordingly, based on the foregoing amendments and remarks, independent Claims 1, 3, 16, 18, 31 to 34 and 36 as amended are believed to be allowable over the applied references.


The other claims in the application are each dependent from the independent claims and are believed to be allowable over the applied references for at least the same reasons. Because each dependent claim is deemed to define an additional aspect of the

invention, however, the individual consideration of each on its own merits is respectfully requested.

No other matters being raised, it is believed that the entire application is fully in condition for allowance, and such action is courteously solicited.

Applicants' undersigned attorney may be reached in our Costa Mesa, California office by telephone at (714) 540-8700. All correspondence should be directed to our address given below.

Respectfully submitted,

  
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